

Mehta, Prachi

From: Mehta, Prachi
Sent: Friday, December 20, 2019 1:18 PM
To: 'Eneda Hoxha'; Eugene Novikov; Ewing, Alexandra M.; bfarnan@farnanlaw.com; Reines, Edward; Walter, Derek; Singer, Randi; Celsee 10X; Rawnsley, Jason J.
Cc: Cottrell@rlf.com; Daralyn Durie; Henry Cornillie; SERVICE-TENX
Subject: RE: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter
Attachments: Cover Letter re Protective Order (Celsee's Additions).DOCX

Eneda,

Your comment regarding the alleged limited "factual record" regarding Mr. LaPointe's roles at ArcherDX and Celsee strikes us as odd given that we've made every effort to try and provide you the information you might need. Our email from yesterday, for instance, states "to the extent 10x finds Mr. LaPointe's role at ArcherDX relevant to the instant dispute regarding the protective order such that it would help resolve the dispute, we would be happy to answer questions about this." Likewise, during our telephonic meet and confer yesterday, we repeatedly asked you to identify any outstanding concerns you have regarding Celsee's proposal. You did not identify any.

What's going on here? If you actually wish to have more information, let us know. If no amount of information will move you, just please be frank and let us know that too.

The updated cover letter with our insertions is attached.

Regards,
Prachi



Prachi V. Mehta

Associate

*Not admitted to practice in California

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From: Eneda Hoxha <ehoxha@durietangri.com>

Sent: Friday, December 20, 2019 11:10 AM

To: Mehta, Prachi <Prachi.Mehta@weil.com>; Eugene Novikov <ENovikov@durietangri.com>; Ewing, Alexandra M. <Ewing@rlf.com>; bfarnan@farnanlaw.com; Reines, Edward <edward.reines@weil.com>; Walter, Derek <Derek.Walter@weil.com>; Singer, Randi <randi.singer@weil.com>; Celsee 10X <celsee.10x@weil.com>; Rawnsley, Jason J. <Rawnsley@RLF.com>

Cc: Cottrell@rlf.com; Daralyn Durie <DDurie@durietangri.com>; Henry Cornillie <HCornillie@durietangri.com>; SERVICE-TENX <SERVICE-TENX@durietangri.com>

Subject: RE: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter

Prachi,

We understand you would like Mr. LaPointe to have access to 10x's AEO information. However the fact is that he is the general counsel of 10x's direct competitor and evidently a deputy general counsel at another genomics company that is not subject to the Court's jurisdiction. The only factual record Celsee has provided with respect to his role at either company is a two-paragraph declaration that says that he works remotely from Boston. 10x is not comfortable providing him unfettered access to its AEO information under these circumstances. Again, the Court has ordered the entry of 10x's proposed protective order, and we remain open to discussing access to particular designated documents and materials.

The cover letter for our proposed protective order is attached.

Regards,

Eneda

Eneda Hoxha | Attorney | **Durie** Tangri LLP | 415-376-6471 | ehoxha@durietangri.com

From: Mehta, Prachi <Prachi.Mehta@weil.com>

Sent: Thursday, December 19, 2019 5:07 PM

To: Eneda Hoxha <ehoxha@durietangri.com>; Eugene Novikov <ENovikov@durietangri.com>; Ewing, Alexandra M. <Ewing@rlf.com>; bfarnan@farnanlaw.com; Reines, Edward <edward.reines@weil.com>; Derek Walter <Derek.Walter@weil.com>; Singer, Randi <randi.singer@weil.com>; Celsee 10X <celsee.10x@weil.com>; Rawnsley, Jason J. <Rawnsley@RLF.com>

Cc: Cottrell@rlf.com; Daralyn Durie <DDurie@durietangri.com>; Henry Cornillie <HCornillie@durietangri.com>; SERVICE-TENX <SERVICE-TENX@durietangri.com>

Subject: RE: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter

Eneda,

We would have been happy to address any concerns you have regarding Mr. LaPointe's role at ArcherDX, had you raised it during this afternoon's meet and confer (or in your letter to the court). Nevertheless, to the extent 10x finds Mr. LaPointe's role at ArcherDX relevant to the instant dispute regarding the protective order such that it would help resolve the dispute, we would be happy to answer questions about this. At the same time, we ask that you be transparent with us about this. If it is a waste of our time to provide this information because you have no intention of moving your position, we ask that you advise us of that fact. Let us know today.

Regards,

Prachi



Prachi V. Mehta

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From: Eneda Hoxha <ehoxha@durietangri.com>

Sent: Thursday, December 19, 2019 4:23 PM

To: Mehta, Prachi <Prachi.Mehta@weil.com>; Eugene Novikov <ENovikov@durietangri.com>; Ewing, Alexandra M. <Ewing@rlf.com>; bfarnan@farnanlaw.com; Reines, Edward <edward.reines@weil.com>; Walter, Derek <Derek.Walter@weil.com>; Singer, Randi <randi.singer@weil.com>; Celsee 10X <celsee.10x@weil.com>; Rawnsley, Jason J. <Rawnsley@RLF.com>

Cc: Cottrell@rlf.com; Daralyn Durie <DDurie@durietangri.com>; Henry Cornillie <HCornillie@durietangri.com>; SERVICE-TENX <SERVICE-TENX@durietangri.com>

Subject: Re: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter

Prachi,

It has consistently been our position that we cannot agree to blanket access to all AEO designated information for Celsee's general counsel (who also appears to have a role at another company in the same field about which Celsee has told 10x and the Court nothing). The Court resolved the parties' dispute on this matter at the hearing by adopting 10x's proposed protective order. In accordance with the Court's order, it remains our position that we are happy to discuss giving Mr. LaPointe access to specific documents designated as AEO that you believe he needs to litigate the case, and we told you so on today's call. You did not wish to engage in that discussion.

As stated during the meet and confer, we will send you the cover letter we plan to submit with the proposed protective order.

Regards,

Eneda

From: Mehta, Prachi <Prachi.Mehta@weil.com>

Sent: Thursday, December 19, 2019 1:23 PM

To: Eneda Hoxha; Eugene Novikov; Ewing, Alexandra M.; bfarnan@farnanlaw.com; Reines, Edward; Derek Walter; Singer, Randi; Celsee 10X; Rawnsley, Jason J.

Cc: Cottrell@rlf.com; Daralyn Durie; Henry Cornillie; SERVICE-TENX

Subject: RE: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter

Eneda,

Pursuant to the Court's 12/16 oral ruling, we submitted to you a revised protective order containing several additional safeguards directly addressing every concern 10x has identified regarding inadvertent disclosure. Without indicating why our proposal did not address your concerns, you summarily rejected it in your email below.

During our meet and confer this afternoon, we once again asked you to identify any outstanding concerns our revised protective order does not address. You did not identify any. We further asked you to identify any additional safeguards or language we can add to the protective order in order to address 10x's concerns regarding Mr. LaPointe having access to highly confidential AEO information. You did not identify any, only indicating that you are not comfortable with Mr. LaPointe having access to highly confidential AEO information.

Please send us the cover letter you plan to submit with the proposed protective order.

Regards,
Prachi



Weil

Prachi V. Mehta

Associate

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From: Mehta, Prachi

Sent: Thursday, December 19, 2019 11:43 AM

To: 'Eneda Hoxha' <ehoxha@durietangri.com>; Eugene Novikov <ENovikov@durietangri.com>; Ewing, Alexandra M. <Ewing@rlf.com>; bfarnan@farnanlaw.com; Reines, Edward <edward.reines@weil.com>; Walter, Derek <derek.walter@weil.com>; Singer, Randi <randi.singer@weil.com>; Celsee 10X <celsee.10x@weil.com>; Rawnsley, Jason J. <Rawnsley@RLF.com>

Cc: Cottrell@rlf.com; Daralyn Durie <DDurie@durietangri.com>; Henry Cornillie <HCornillie@durietangri.com>; SERVICE-TENX <SERVICE-TENX@durietangri.com>

Subject: RE: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter

Eneda,

Let's speak at 12:45 PT today. Please use the following dial in:

Dial in Number: 888-235-7501

Conference Code: 6508023015

Regards,

Prachi



Weil

Prachi V. Mehta

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From: Eneda Hoxha <ehoxha@durietangri.com>

Sent: Thursday, December 19, 2019 11:33 AM

To: Mehta, Prachi <Prachi.Mehta@weil.com>; Eugene Novikov <ENovikov@durietangri.com>; Ewing, Alexandra M. <Ewing@rlf.com>; bfarnan@farnanlaw.com; Reines, Edward <edward.reines@weil.com>; Walter, Derek <Derek.Walter@weil.com>; Singer, Randi <randi.singer@weil.com>; Celsee 10X <celsee.10x@weil.com>; Rawnsley, Jason J. <Rawnsley@RLF.com>

Cc: Cottrell@rlf.com; Daralyn Durie <DDurie@durietangri.com>; Henry Cornillie <HCornillie@durietangri.com>; SERVICE-TENX <SERVICE-TENX@durietangri.com>

Subject: RE: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter

Prachi,

We are available between 12:30 and 2:30pm PT today.

Regards,

Eneda

Eneda Hoxha | Attorney | **Durie** Tangri LLP | 415-376-6471 | ehoxha@durietangri.com

From: Mehta, Prachi <Prachi.Mehta@weil.com>

Sent: Thursday, December 19, 2019 10:47 AM

To: Eneda Hoxha <ehoxha@durietangri.com>; Eugene Novikov <ENovikov@durietangri.com>; Ewing, Alexandra M. <Ewing@rlf.com>; bfarnan@farnanlaw.com; Reines, Edward <edward.reines@weil.com>; Derek Walter <Derek.Walter@weil.com>; Singer, Randi <randi.singer@weil.com>; Celsee 10X <celsee.10x@weil.com>; Rawnsley, Jason J. <Rawnsley@RLF.com>

Cc: Cottrell@rlf.com; Daralyn Durie <DDurie@durietangri.com>; Henry Cornillie <HCornillie@durietangri.com>; SERVICE-TENX <SERVICE-TENX@durietangri.com>

Subject: RE: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter

Eneda,

Please let us know when you are available for a meet and confer today.

Regards,

Prachi



Prachi V. Mehta

Associate

*Not admitted to practice in California

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From: Eneda Hoxha <ehoxha@durietangri.com>

Sent: Thursday, December 19, 2019 10:29 AM

To: Mehta, Prachi <Prachi.Mehta@weil.com>; Eugene Novikov <ENovikov@durietangri.com>; Ewing, Alexandra M. <Ewing@rlf.com>; bfarnan@farnanlaw.com; Reines, Edward <edward.reines@weil.com>; Walter, Derek <Derek.Walter@weil.com>; Singer, Randi <randi.singer@weil.com>; Celsee 10X <celsee.10x@weil.com>; Rawnsley, Jason J. <Rawnsley@RLF.com>

Cc: Cottrell@rlf.com; Daralyn Durie <DDurie@durietangri.com>; Henry Cornillie <HCornillie@durietangri.com>; SERVICE-

TENX <SERVICE-TENX@durietangri.com>

Subject: RE: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter

Prachi,

The Court's order was to "adopt 10x's proposal with the two-tier confidentiality tier and highly confidential attorneys' eyes only tier, rather than Celsee's proposal." Tr. at 27:12-15. That adoption, as you noted below, was "without prejudice to Celsee to continue to meet and confer with 10x to see if the parties can come to some terms, . . ." but what you omitted after the ellipsis is "specifically with respect to carving out access for Mr. LaPointe to **certain documents that he might not otherwise have access to under the provision I am adopting today.**" Tr. at 27:16-28:1. The subsequent sections of the transcript you cite are similarly in the context of potential future disputes regarding contesting the designation of documents under the protective order. The Court's order has thus already resolved the parties' dispute by adopting 10x's proposed protective order. While we don't believe a call is necessary at this point, we are happy to discuss further if you believe it would be helpful. Alternatively, please let us know if we have your consent to file 10's proposed protective order, or if the parties should inform the Court that Celsee intends to file an objection to the Court's order.

Regards,

Eneda

Eneda Hoxha | Attorney | Durie Tangri LLP | 415-376-6471 | ehoxha@durietangri.com

From: Mehta, Prachi <Prachi.Mehta@weil.com>

Sent: Wednesday, December 18, 2019 1:22 PM

To: Eugene Novikov <ENovikov@durietangri.com>; Ewing, Alexandra M. <Ewing@rlf.com>; bfarnan@farnanlaw.com; Reines, Edward <edward.reines@weil.com>; Derek Walter <Derek.Walter@weil.com>; Singer, Randi <randi.singer@weil.com>; Celsee 10X <celsee.10x@weil.com>

Cc: Cottrell@rlf.com; Daralyn Durie <DDurie@durietangri.com>; Eneda Hoxha <ehoxha@durietangri.com>; Henry Cornillie <HCornillie@durietangri.com>; SERVICE-TENX <SERVICE-TENX@durietangri.com>

Subject: RE: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter

Eugene,

We disagree with your oversimplification of the Court's oral ruling. To the extent the Court temporarily adopted 10x's proposal, it did so "without prejudice to Celsee to continue to meet and confer with 10x to see if the parties can come to some terms, . . ." 12/16/19 Transcript at 27:16-19. As the Court stated, "certainly, I think with respect to Mr. LaPointe there may be a path forward." *Id.* at 29:24-30:2. The Court further indicated that it was "expecting some flexibility on the part of 10x." *Id.* at 30:23-24. Below we direct you to additional, relevant guidance from the Court:

- "And I think that 10x -- I'm sure both sides, not just 10x, but Celsee too, can read between the lines of this ruling and know ***I'm expecting some flexibility here***, that if a small company like Celsee truly needs attorneys' eyes only documents to be shared with Mr. LaPointe in order to make strategic litigation-related decisions in the case, then there has to be some flexibility there." *Id.* at 30:12-22.
- "***I'm expecting some flexibility on the part of 10x***, because when disputes get to the point where there's no alternative but to present them here to the Court, I'm going to be looking for whether there has been flexibility. If I find that that's really important information for Celsee to be able to share with Mr. LaPointe or, you know, in the event that, you know, there becomes another individual there, as of to date unknown, that it needs to be shared, I'm going to be looking for some flexibility and not

unreasonable conduct to tie the hands of Celsee from litigating this case as it needs to. So, I'll be looking for that." *Id.* at 30:23-31:15.

- "... ***I will be receptive to an amendment to the protective order*** if the parties are able to reach agreement to carve out a provision for Mr. LaPointe. And I will be receptive to hearing any further disputes with respect to overuse of the attorneys' eyes only confidential designation in this case in an effort to not necessarily truly protect sensitive information, but more as an offensive weapon to tie the hand to the other side in litigating the case properly." *Id.* at 31:24-32:12.

We note that you fail to offer any explanation as to how or why our proposal fails to address your concerns.

Please let us know when you are available for a meet and confer today or tomorrow to discuss what additional language would satisfy 10x, so as to comply with the Court's guidance.

Regards,
Prachi



Prachi V. Mehta

Associate

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From: Eugene Novikov <ENovikov@durietangri.com>

Sent: Wednesday, December 18, 2019 10:39 AM

To: Mehta, Prachi <Prachi.Mehta@weil.com>; Ewing, Alexandra M. <Ewing@rlf.com>; bfarnan@farnanlaw.com; Reines, Edward <edward.reines@weil.com>; Walter, Derek <Derek.Walter@weil.com>; Singer, Randi <randi.singer@weil.com>; Celsee 10X <celsee.10x@weil.com>

Cc: Cottrell@rlf.com; Daralyn Durie <DDurie@durietangri.com>; Eneda Hoxha <ehoxha@durietangri.com>; Henry Cornillie <HCornillie@durietangri.com>; SERVICE-TENX <SERVICE-TENX@durietangri.com>

Subject: RE: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter

Prachi:

The Court ordered that 10x's proposed protective order should be entered. While the Court encouraged the parties to continue to meet and confer, as I expressed at the teleconference and as set forth in our letter, 10x does not believe it is appropriate for Celsee's General Counsel to have unfettered access to outside counsel's eyes only information as he does not meet the *U.S. Steel* standard on this record. We therefore disagree that your changes "address all of our concerns."

As instructed by the Court we will be open to meet and confer should there be specific designated documents you believe Mr. LaPointe needs to see to be able to manage the litigation.

Attached is the protective order the Court ordered to be entered. Please confirm we may file it.

Gene

Gene Novikov | Durie Tangri LLP | 415-376-6410 | enovikov@durietangri.com

From: Mehta, Prachi <Prachi.Mehta@weil.com>

Sent: Wednesday, December 18, 2019 9:48 AM

To: Ewing, Alexandra M. <Ewing@rlf.com>; bfarnan@farnanlaw.com; Reines, Edward <edward.reines@weil.com>; Derek Walter <Derek.Walter@weil.com>; Singer, Randi <randi.singer@weil.com>; Celsee 10X <celsee.10x@weil.com>
Cc: Cottrell@rlf.com; Daralyn Durie <DDurie@durietangri.com>; Eugene Novikov <ENovikov@durietangri.com>; Eneda Hoxha <ehoxha@durietangri.com>; Henry Cornillie <HCornillie@durietangri.com>; SERVICE-TENX <SERVICE-TENX@durietangri.com>

Subject: RE: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter

Counsel,

I write to follow up on our email below, as the deadline to file the protective order is 12/20.

Regards,
Prachi



Prachi V. Mehta

Associate

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From: Mehta, Prachi

Sent: Monday, December 16, 2019 4:04 PM

To: 'Ewing, Alexandra M.' <Ewing@rlf.com>; bfarnan@farnanlaw.com; Reines, Edward <edward.reines@weil.com>; Walter, Derek <derek.walter@weil.com>; Singer, Randi <randi.singer@weil.com>; Celsee 10X <celsee.10x@weil.com>
Cc: Cottrell@rlf.com; DDurie@durietangri.com; enovikov@durietangri.com; Eneda Hoxha <ehoxha@durietangri.com>; Henry Cornillie <HCornillie@durietangri.com>; SERVICE-TENX@durietangri.com

Subject: RE: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter

Counsel,

Please see attached a revised draft of the protective order addressing all of your concerns with regard to Mr. LaPointe. Please confirm that this is acceptable.

If you have any additional issues, please let us know when you are available for a meet and confer.

Regards,
Prachi



Prachi V. Mehta

Associate

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From: Ewing, Alexandra M. <Ewing@rlf.com>

Sent: Wednesday, December 11, 2019 11:03 AM

To: bfarnan@farnanlaw.com; Reines, Edward <edward.reines@weil.com>; Walter, Derek <Derek.Walter@weil.com>; Singer, Randi <randi.singer@weil.com>; Celsee 10X <celsee.10x@weil.com>

Cc: Cottrell@rlf.com; DDurie@durietangri.com; enovikov@durietangri.com; Eneda Hoxha <ehoxha@durietangri.com>; Henry Cornillie <HCornillie@durietangri.com>; SERVICE-TENX@durietangri.com

Subject: FW: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter

Counsel,

Attached please find an as-filed copy of 10x's letter regarding the protective order dispute.

Best,
Ally

Alexandra M. Ewing
Richards, Layton & Finger, P.A.
One Rodney Square
920 North King Street
Wilmington, DE 19801
302-651-7898 (direct dial)
Ewing@rlf.com

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From: ded_nefreply@ded.uscourts.gov <ded_nefreply@ded.uscourts.gov>

Sent: Wednesday, December 11, 2019 1:56 PM

To: ded_ecf@ded.uscourts.gov

Subject: Activity in Case 1:19-cv-00862-CFC-SRF 10x Genomics, Inc. v. Celsee, Inc. Letter

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U.S. District Court
District of Delaware

Notice of Electronic Filing

The following transaction was entered by Cottrell, Frederick on 12/11/2019 at 1:55 PM EST and filed on 12/11/2019

Case Name: 10x Genomics, Inc. v. Celsee, Inc.

Case Number: [1:19-cv-00862-CFC-SRF](#)

Filer:

Document Number: [45](#)

Docket Text:

[Letter to The Honorable Sherry R. Fallon from Frederick L. Cottrell, III regarding Dispute concerning the Protective Order - re SO ORDERED,,, Set Hearings,, \(Attachments: # \(1\) Text of Proposed Order, # \(2\) Exhibits A-C\)\(Cottrell, Frederick\)](#)

1:19-cv-00862-CFC-SRF Notice has been electronically mailed to:

Alexandra M. Ewing ewing@rlf.com, christine-renshaw-0118@ecf.pacerpro.com, renshaw@rlf.com

Brian E. Farnan bfarnan@farnanlaw.com, tfarnan@farnanlaw.com

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Eneda Hoxha ehoxha@durietangri.com

Eugene Novikov enovikov@durietangri.com

Frederick L. Cottrell , III cottrell@rlf.com, christine-renshaw-0118@ecf.pacerpro.com, renshaw@rlf.com

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Jason James Rawnsley rawnsley@rlf.com, patricianne-stewart-3997@ecf.pacerpro.com, pstewart@rlf.com

1:19-cv-00862-CFC-SRF Filer will deliver document by other means to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1079733196 [Date=12/11/2019] [FileNumber=4043249-0] [673788df4ee9e4975a18b9d6a4ac422ef28ac1c580416393c02e6a0b65ce31227610d9ff73d921855716bab109444f125cd12650c2dbc3e27cc29669b575da01]]

Document description:Text of Proposed Order

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1079733196 [Date=12/11/2019] [FileNumber=4043249-1] [73b7986c64f9f5d81e33661334ddd3d8e79c583a477526a2271c11299f48e58a2da038b12eb2160d5d44555e7602e7e737fe5a20a5dadeffe1f4efd97172fd4c]]

Document description: Exhibits A-C

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